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August 5, 2020

VIA CM/ECF

The Honorable Leonard P. Stark
United States District Court
for the District of Delaware
844 North King Street
Wilmington, DE 19801

Re: *Cirba Inc., et al. v. VMware, Inc.*, C.A. No. 19-742-LPS

Dear Chief Judge Stark:

The parties in the above-captioned litigation, having met and conferred regarding the upcoming claim construction hearing scheduled to commence at 1:00 pm on August 7, 2020, write to the Court to address some hearing logistics. The parties propose, like the previous claim construction hearing held on November 1, 2019, to proceed term by term, with the patent holder going first for each term. The parties also propose streamlining the hearing by submitting on the papers without oral argument the following disputed claim terms:

- **'266 Patent**
 - “identifying” (Independent Claim 1)
- **'151 Patent**
 - “optimizing” / “optimize” (Independent Claims 1, 12)
 - “operating conditions” (Independent Claims 1, 12)
 - “the at least one policy set” (Independent Claims 1, 12)
 - “objective” (Dependent Claims 3, 4, 14, 15)
- **'752 Patent**
 - “interfacing with the distributed computer systems at a remote resource allocation module that is located outside of the distributed computer systems” (Independent Claims 1, 9)

Should Your Honor have any questions or concerns regarding the foregoing, the parties are available at the Court’s convenience.

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Respectfully,

/s/ Anne Shea Gaza

Anne Shea Gaza (No. 4093)

cc: All Counsel of Record (CM/ECF and E-mail)